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*Attorneys for Defendant C.R. England, Inc.*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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AARON CORDERO, individually, and on  
behalf of other aggrieved employees pursuant  
to the California Private Attorneys General  
Act,

Plaintiffs,

v.

C.R. ENGLAND, INC., a Utah Corporation;  
and DOES 1 through 50, inclusive,

Defendant.

**NOTICE OF SETTLEMENT AND  
MOTION FOR EXTENSION OF TIME**

Civil No. 2:21-cv-00280

Judge Jill N. Parrish

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

Plaintiff Aaron Cordero (“Plaintiff”),<sup>1</sup> on the one hand, and Defendant C.R. England, Inc.  
 (“Defendant”), on the other (collectively, the “Parties”), hereby jointly notify the Court that a

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<sup>1</sup> Counsel for Plaintiff has not been admitted pro hac vice or associated local counsel, and so has not entered an appearance in this case. Accordingly, rather than Plaintiff filing this Notice of Settlement, Defendant represents to the Court that Plaintiff’s counsel (i.e., the law firm of Lawyers for Justice, PC) has reviewed this document and executed it as demonstrated below.

settlement has been reached in this case that will resolve this action in its entirety. The material terms of the settlement have been agreed upon and the Parties are now in the process of memorializing the settlement. In fact, the Parties have a settlement agreement prepared that just needs to be executed by Plaintiff but he lives in a remote area and does not have reliable cell phone or internet access unless he travels to an area with good cell reception, and his counsel has been unable to reach him this week. The Parties anticipate that Plaintiff will execute the settlement agreement soon. They will then promptly file a joint stipulation for dismissal along with a proposed order dismissing this action in its entirety. The Parties respectfully request that they be given until the end of January, 2022 to file the aforementioned joint stipulation and proposed order dismissing this case in its entirety.

#### **MOTION FOR EXTENSION OF TIME**

On November 2, 2021, the Court issued an order requiring Plaintiff or his counsel to file an appearance in this matter by December 17, 2021. [ECF No. 45.] However, given that the Parties have reached a settlement and the case will shortly be dismissed *with prejudice* as to Plaintiff, the Parties request an extension to the date by which Plaintiff or his counsel must appear to avoid dismissal *without* prejudice. Such an extension should permit Plaintiff's counsel time to get the settlement agreement executed by Plaintiff and enable Defendant to receive the dismissal for which it negotiated without Plaintiff or his counsel incurring undue expense and unnecessary administration.

The Parties were hoping to file the anticipated joint stipulation for dismissal along with a proposed order dismissing this action in its entirety on or before the December 17, 2021 deadline (and that could still potentially happen if Plaintiff's counsel can reach Plaintiff before the end of

the day). However, Plaintiff lives in a remote location without regular access to the internet or cellular service. Plaintiff's counsel has been attempting to contact Plaintiff to execute the settlement agreement this week, but have not yet been able to reach him. Plaintiff's counsel believes that it will be able to reach Plaintiff and get executed copies of all settlement documentation within four weeks. At that point, the Parties will file the joint stipulation for dismissal and accompanying proposed order.

Consequently, the Parties jointly request that the appearance date set in the Court's November 2, 2021 Order be extended to January 31, 2022. Should the Parties encounter any additional delay in the settlement process, the Parties will notify the Court.

DATED this 17<sup>th</sup> day of December 2021.

RAY QUINNEY & NEBEKER P.C.

/s/ Scott A. Hagen

Scott A. Hagen

*Attorneys for Defendant C.R. England, Inc.*

LAWYERS FOR JUSTICE, P.C.

/s/ Joanna Ghosh

Joanna Ghosh

*(signed with permission )*

*Attorneys for Plaintiff Aaron Cordero*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of December, 2021, copies of the foregoing (1) **NOTICE OF SETTLEMENT AND MOTION FOR EXTENSION OF TIME and (2) [PROPOSED] ORDER** were electronically filed with the Clerk of the Court using the CM/ECF system and served via United States Postal Service, pre-paid, to the following non-CM/ECF participant:

Edwin Aiwarzian  
Joanna Ghosh  
Lawyers for Justice, PC  
410 West Arden Avenue, Suite 203  
Glendale, CA 91203-4007

/s/ TerriAnne Gillis

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